

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

AGWAY FARM & HOME SUPPLY, LLC,

Debtor.¹

Chapter 11

Case No. 22-10602 (JKS)

Hearing Date: December 28, 2023 at 10:00 a.m. (ET)
Re: Docket No. 869

**DECLARATION OF MELISSA DAVIS LOWE IN SUPPORT OF CONSOLIDATED
SEVENTEENTH MONTHLY AND FINAL FEE APPLICATION OF SHULMAN
BASTIAN FRIEDMAN & BUI LLP, BANKRUPTCY COUNSEL TO THE DEBTOR,
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR THE PERIOD FROM JULY 5, 2022 THROUGH NOVEMBER 29, 2023**

I, Melissa Davis Lowe, declare as follows:

1. I am a partner with the law firm of Shulman Bastian Friedman & Bui LLP (the “Firm”) and one of the attorneys primarily responsible for the representation of Agway Farm & Home Supply, LLC, the reorganized debtor herein (the “Debtor”). Except as otherwise stated, I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. I am submitting this declaration in support of the Firm’s Consolidated Seventeenth Monthly and Final Fee Application for Allowance of Compensation and Reimbursement of Expenses For the Period From July 5, 2022 Through November 29, 2023 (the “Application”). All capitalized terms not otherwise defined herein shall have the meaning ascribed in the Application.

3. I submit this declaration to address certain questions raised informally by the Court related to the Application.

¹ The last four digits of the Debtor’s federal tax identification number are 1247. The Debtor’s address is 6606 W. Broad Street, Richmond, VA 23230.

4. Most of the questions from the Court relate to travel expenses incurred by two of the Firm's attorneys, which are addressed below.

5. The travel expenses incurred by the Firm relate to two trips from Southern California to Wilmington, Delaware – one by Mr. Alan Friedman and the other by me. Mr. Friedman traveled to Wilmington from August 27, 2023 to August 28, 2023 to attend the hearing on the solicitation motion, as included in the Firm's 14th monthly fee application. I travelled to Wilmington from October 18, 2023 to October 20, 2023 to attend the hearing on confirmation of the Debtor's plan, as included in the Firm's 15th monthly fee application.

6. To provide additional information on the travel expenses for Mr. Friedman's travel, the Firm provides the following:

a. \$188.60 covered a one night stay plus government fees and taxes at the Sheraton Suites in Wilmington, DE.

b. \$1,187.56 covered round trip airfare from Los Angeles to Philadelphia for a refundable coach ticket.

c. \$89.74 covered parking expense at the Wallypark at the Los Angeles airport.

d. \$180.00 covered roundtrip flat rate transportation from the Philadelphia airport to Wilmington, DE.

7. To provide additional information on the travel expenses for Ms. Lowe's travel, the Firm provides the following:

a. \$787.82 relates to airfare roundtrip on American Airlines, coach ticket, from Los Angeles to Philadelphia.

b. \$293.98 relates to an Uber ride from Irvine, California to the Los Angeles airport and also a Lyft ride from the Philadelphia airport to the Sheraton Suites in Wilmington.

c. \$207.80 (\$279.80-\$72.00 credit) relates to a charge for airfare in order to return to Santa Ana instead of Los Angeles from Philadelphia, and remained a coach ticket on American Airlines.

d. \$41.93 related to meals during the trip, believed to be a lunch at the Los Angeles airport, dinner at the Philadelphia airport, and then lunch the next day in Wilmington. All meals were for Ms. Lowe only and did not include any alcoholic beverages.

e. \$367.40 relates to a two night stay at the Sheraton Suites in Wilmington which covers the nightly rate (\$180 for one night and \$154 for the other night) plus \$33.40 in taxes and fees.

8. Ms. Lowe's time entry on November 22, 2023 for 0.2 hours was incomplete and should have stated: "Review and exchange various correspondence with client reps and plan administrator re transfer of funds to plan administrator to go effective and dates for final fee applications."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 22, 2023 at Irvine, California.

/s/ Melissa Davis Lowe
Melissa Davis Lowe